ATTACHMENT II-6

CONTINGENCY PLAN

1.0 GENERAL FACILITY DESCRIPTION

The Grassy Mountain Facility is an existing treatment, storage and disposal facility for industrial, and hazardous wastes which includes laboratory, container storage units, chemical treatment units, storage tanks, a surface impoundment, several landfill cells and support facilities such as locker rooms, communications systems, lunch rooms, and office facilities.

The Grassy Mountain Facility site also has PCB storage (container and tank), transformer drain and flush, and chemical landfill disposal cells. These facilities are PPM, Inc. and Grayback Mountain respectively. Throughout this plan all facilities are referred to as Grassy Mountain facility or GM.

A wide range of waste types for subsequent treatment, reclamation, recycling and disposal are accepted.

1.1 Intent and Purpose of Contingency Plan

The Contingency Plan has been developed to protect human health and the environment in the event of a release of hazardous materials, personal injury accident, fire or explosion.

The emergency response procedures outlined in this plan are intended to meet the mandates of the regulatory agencies having jurisdiction over the facility including:

- The State of Utah Department of Environmental Quality through the administration of the RCRA hazardous waste regulatory program (i.e. Section R315 of the Utah Administrative Code).
- The United States Environmental Protection Agency through the administration of the PCB regulatory program (i.e. Title 40, Code of Federal Regulation, Part 761) and the Hazardous and Solid Waste Amendments of 1984.
- The U.S. Department of Labor, Occupational Safety and Health Administration (i.e. Title 29, code of Federal Regulations, Part 1910).
- Tooele County through implementation of the Conditional Use Permit for the Grassy Mountain Facility.
- The U.S. Department of the Interior, Bureau of Land Management through implementation of an agreement allowing access to the facility over public lands.

1.2 Identification, Location and Site Plan

Name: Clean Harbors Grassy Mountain, LLC

Location: Located at the eastern edge of the Great Salt Lake Desert of Tooele County, Utah; 3 miles East and 7 miles North of Knolls, Exit 41 of Interstate 80.

Latitude 40º 49' 00" N; **Longitude** 113º 12' 30" W

Township 1 North; Range 12 West; Section 16, plus a 0.5-mile perimeter buffer around the

section

Facility Telephone: (801) 801 323-8900

Site Plan: Figure 1-1 is the location map for the facility.

Figure 1-2 is a plan view of the waste handling and processing areas of the facility with evacuation routes.

insert **Figure 1-1: VICINITY PLAN**

insert **Figure 1-2: PLAN VIEW OF SITE / EVACUATION ROUTES**

1.3 Facility Operations

GM manages PCBs (TSCA), industrial and hazardous wastes (RCRA) utilizing the following process units:

- Container handling and storage facility.
- Stabilization treatment in containers and tanks.
- Landfill units.
- Surface impoundment.
- Analytical laboratory.
- Transformer drain and flush.
- Leachate treatment and storage
- Debris Treatment

1.4 Waste Types Handled at the Facility

GM accepts, processes and disposes of a wide variety of waste materials. Hazardous, non-hazardous, industrial waste and TSCA waste streams are handled in containers (e.g. drums, small tanks, pails, cartons, bags, etc.) and in bulk form (e.g. end dumps, roll-offs, gondolas, roll-off trailers and tank trucks).

Waste types typically handled at the facility and their potential hazards are identified below:

- Liquid acids and bases, which may cause burns if brought into contact with the skin.
- Waste paint and degreasing solvents, which may be ignitable or cause illness if inhaled or ingested.
- Polychlorinated biphenyls, which may cause illness if ingested.
- Heavy metals, which may cause illness if ingested.
- Cyanides and sulfide wastes which may release toxic gases if improperly managed.
- Discarded chemical products, which have a wide range of characteristics.
- Asbestos, which may cause illness if inhaled.
- Oily wastes which may burn.
- Soils and other solid materials contaminated with any of the above materials.

1.5 Types of Potential Emergencies

The potential for an emergency exists at the facility due to the activities performed within the boundaries of the facility and the types of materials handled. Additionally, natural or other events (e.g. "acts of God") could create an emergency situation at the facility that must be appropriately and effectively managed. These types of events are addressed below as situations, which could potentially cause the Emergency Coordinator to trigger implementation of the Contingency Plan if necessary.

1.5.1 Hazards Inherent to Facility Operation

Potential emergencies, which could result from any industrial facility operation:

1.5.1.1 Fire

(a) Could cause release of toxic fumes,
(b) Could spread and possibly ignite materials at other locations on-site or cause heat induced explosions,
(c) Could produce contaminated runoff from fighting fires with extinguishing chemicals or water,
(d) Could injure personnel,
(e) Could cause damage to the physical structures of the facility.

1.5.1.2 Explosion

(a) Could cause a safety hazard from flying fragments or shock waves,
(b) Could ignite other waste at the facility,
(c) Could damage other containers or tanks at the facility which would result in release of toxic material,
(d) Could cause injury to personnel.
(e) Could damage physical structures at the facility

1.5.1.3 Spill or Material Release

(1) Could result in the release of flammable liquids or vapors capable of causing a fire or gas explosion,
(a) Could cause the release of toxic liquids or vapors,
(b) Could result in contamination of surface or ground water, and/or soil,
(c) Could cause injury to personnel.
(d) Could damage physical structures at the facility

1.5.1.4 Accident (vehicle or equipment)

(a) Could cause fire, explosion, or spill,
(b) Could cause in mixing of incompatible chemicals.
(c) Could cause release of toxic materials to surface water, soil, or air,
(d) Could cause injury to personnel.

1.5.2 Natural Events

Facility emergencies can arise from natural events, such as earthquakes or thunderstorms, to which the Emergency Coordinator will respond as indicated in this Contingency Plan. The facility maintains emergency response equipment as well as personnel trained in its use, which are expected to appropriately respond to these events.

1.6 Delegation and Assignment

The Contingency Plan shall identify a number of individuals who are trained to coordinate the response of the facility to an emergency event. These personnel may not always be present at the facility when an event occurs.

The facility typically operates on a five day per week, day shift only basis. Security shall be present 24 hours per day, seven days per week. One of the Emergency Coordinators listed in Table 2-2 is always on call. If the on-call Emergency Coordinator is not at the facility, then he is available to those individuals present at the facility through a paging device or other means.

Depending upon the nature of the event the on-call Emergency Coordinator may delegate certain duties to those present at the facility by telephone.

1.7 Authority

The Emergency Coordinator (primary or alternate) has been granted the authority necessary to carry out the procedures outlined in this Contingency Plan in the event of an emergency. Authorities include:

(a) Deploy equipment,
(b) Direct company personnel,
(c) Contact regulatory agencies,
(d) Contract for commercial vendors,

(e) Summon assistance from hospitals, fire departments etc.
(f) Shutdown operations and evacuate the facility

2.0 IMPLEMENTATION OF RESPONSE PROCEDURES

Appropriate and prudent response activities shall be initiated in the event of any incident, which results in fire, explosion, or accidental release of toxic materials. The Emergency Coordinator or his designee shall perform an assessment of the situation immediately. Criteria considered in this assessment are shown in Table 2-1. A decision is made whether or not to implement the Contingency Plan in whole or in part and shall be documented in the operating record.

2.1 Incident Assessment and Decision Process

The response of the facility to an incident shall be tailored to the requirements of the particular event. While the Contingency Plan presents a broad range of capabilities and procedures only those activities appropriate to a particular situation are employed. For example, the facility will only be evacuated if the personnel are in direct physical danger.

A logic diagram of the initial response activities leading to implementation of the Contingency Plan is shown in Figure 2-1. Should the release be of a minor or controllable nature, which presents no immediate hazard to human health or the environment, the Emergency Coordinator will only implement the post-emergency procedures described in Section 7.0 and complete any necessary reporting described in Section 9.0.

The person observing an incident, which he believes, could involve a threat to human health or the environment will implement the following procedures (employees shall be trained in hazard recognition, see Module II-4):

(a) Activate the incident warning system (telephone, two-way radio or emergency alarm) to notify facility personnel,
(b) Contact the Emergency coordinator and report name, location, nature and extent of the incident.
(c) Begin containing and collecting the released material with control measures such as diking with soil or other sorbent materials as available. Alternately, a suitable container may be used to collect the material if available.

The Emergency Coordinator will take control of the affected area and any resources necessary until the emergency has been eliminated and necessary cleanup or restoration is completed.
The Emergency Coordinator will direct the following activities during the evaluation process:

(a) Where applicable, see that the process and/or operations are stopped and that any released waste is contained and collected in order to ensure that fires or explosions do not occur or spread.
(b) Determine the source and extent of the released materials and assess the primary and secondary hazards. Evaluation criteria used by the Emergency Coordinator to determine if the Contingency Plan is to be implemented are presented in Table 2-1. The Emergency Coordinator will implement the Contingency Plan based upon the criteria only if the incident could immediately threaten human health or the

environment. The Emergency Coordinator will implement the Contingency Plan based upon the criteria only if the incident could immediately threaten human health or the environment.

insert **Figure 2-1: CONTINGENCY PLAN IMPLEMENTATION LOGIC DIAGRAM**

TABLE 2-2: EMERGENCY COORDINATORS

Report all emergencies to the Emergency Coordinator or Designee.

Position	Name	Telephone Numbers	Address
Primary	Shane Whitney	801-969-7805 (Home) 435-884-8976 (Office) 801-557-2946 (Cell)	3515 West 4400 South West Valley City, UT 84119
Alternate	Les Ashwood	435-649-4238 (Home) 435-884-8967 (Office) 801-580-6420 (Cell)	8861 N. Cove Dr. Park City, UT 84098
Alternate	Blaine Boyer	435-884-0670 (Home) 435-884-8961 (Office)	291 East North Street Grantsville, UT 84029
Alternate	Jerry Miller	801-576-1502 (Home) 435-884-8978 (Office) 801-573-2118 (Cell)	11135 Windy Peak Ridge Dr. Sandy, UT 84094

TABLE 2-3: EXTERNAL NOTIFICATION SUMMARY

The following organizations may be notified of an emergency condition if appropriate.

Emergency Services	Business Number	Emergency Number
West Wendover Fire Department[1]	(775) 664-2274	Dispatch (775) 664-4393 or **911**
West Wendover Police Department[1]	(775) 664-2930	
West Wendover Ambulance[1]	(775) 664-2081	
Air Medical Evacuation[1] University of Utah Hospital Helicopter	(801) 581-7200	Dispatch (801) 581-2500 or **911**
Life Flight[1] LDS Hospital	(801) 321-3330	Dispatch (801) 321-1234 or **911**
North Tooele County Fire District[1]	(435) 882-6730	Dispatch (801) 882-5600 or **911**
Grantsville Fire Department[1]	(435) 884-3343	
Grantsville Police Department[1]	(435) 884-6881	
Grantsville Ambulance[1]	(435) 882-5600	
Tooele County Sheriff[1]	(435) 882-5600	
Tooele Police Department[1]	(435) 882-8900	
Tooele Ambulance[1]	(435) 882-5600	
National Poison Control[2]	4-1-800-222-1222	
National Response Center[2]	4-1-800-424-8802	
Utah Division of Solid and Hazardous Waste[1]	(801 538-6170	(801) 536-4123
Clean Harbors Corporate Office	(781) 849-1800	
U.S. EPA Region VIII[1]	(303) 312-6312	
Utah Highway Patrol[1]	(801) 965-4518	
3E[2]	4-1-800-360-3220	
Bureau of Land Management	801-977-4300	

1 *Provided with a copy of this Plan.*

TABLE 2-4: BUREAU OF LAND MANAGEMENT - NOTIFICATION SUMMARY

This attachment provides supplemental information to Table 2-3, which requires notification to the Bureau of Land Management within six hours of any reportable spill or release, which occurs along the right-of-way route. This information may be updated as necessary to provide the holder with current information as to names and telephone numbers. If notification is necessary, attempts should be made to contact the first person listed, working down the list until a contact is made.

NAME & TITLE	OFFICE	PHONE
Ms. Linda Coleville Support Services Division Chief	BLM State Office	(801) 539-4244 or (801) 977-4300

2.2 Implementation of the Contingency Plan

Immediately upon making a decision to implement the Contingency Plan, the Emergency Coordinator shall direct the following activities, as appropriate for the situation:

(a) Initiation of containment and control procedures, as described in Section 3.0,
(b) Accounting for all facility personnel/visitors by head count and from the sign-in/sign-out sheets,
(c) Implementation of internal notification and provide authorities with an assessment of the situation, and request assistance,
(d) Coordination of first-aid activities, if injuries are involved, and activation of the Casualty Control Procedures, described in Section 5.0,
(e) Evacuation through implementation of the Evacuation Plan, described in Section 6.0.

2.3 Internal Notification and Responsibilities

Any employee discovering a fire or hazardous materials release shall immediately notify the Emergency Coordinator. Personnel in the immediate area who may be in danger will also be notified. Emergency notification personnel shall be identified in the "Internal Notification Action Summary", as shown in Table 2-2. Only one individual will act as the Primary Emergency Coordinator during an emergency. The next designated alternate shall assume responsibility if the primary is not available at that time.

2.4 External Notification

A listing of additional off-site contacts that may be required during an emergency is presented in Table 2-3. The Emergency Coordinator will determine the appropriate agencies to be notified for each incident. The Emergency Coordinators (Primary and alternates) will be trained in the notification requirements as part of the Personnel Training Program.

Specific notification shall be made to the Department of Environmental Quality, Solid and Hazardous Waste Division if a spill of either of the following occurs:

(a) One kilogram (i.e. 2.204 pounds) of a P-listed waste (i.e. acutely hazardous discarded commercial chemical product) or
(b) One hundred kilograms (i.e. 220.4 pounds) of any other hazardous waste or material that becomes a hazardous waste when spilled.

This notification to DEQ must include the following information:

(a) Name, phone number, and address of person responsible for the spill.
(b) Name, title, and phone number of individual reporting the spill.
(c) Time and date of spill.
(d) Location of spill - as specific as possible including nearest town, city, highway, or waterway.
(e) Description contained on the manifest and the amount of material spilled.
(f) Cause for the spill.
(g) Emergency action taken to minimize the threat to human health and the environment.

2.5 General Responsibilities

The Emergency Coordinator has been given the following responsibilities and authorities during an emergency incident:

(a) Coordinate all response measures,
(b) Direct the emergency crew during each operating shift,
(c) Designate other employees to assist where necessary,
(d) Expend all necessary resources to appropriately address the situation in a timely manner,
(e) Return used and expended equipment to operating condition, if reusable,
(f) Provide and secure all necessary medical assistance
(g) Solicit assistance of external response agencies,
(h) Make all required immediate governmental notifications by telephone and file all necessary written reports and notifications.

An Emergency Coordinator shall always be on-call and able to be reached via telephone, pager, or radio. Facility management personnel shall maintain continuous communication on a radio frequency selected by the EC or other communication medium during an emergency event. Other responding agencies will be notified of the selected means of communication and appropriate channel upon arrival at the site.

The Emergency Coordinator is authorized to activate emergency response procedures by assembling equipment and determining its proper application. Section 4.0 describes the emergency equipment available to the Emergency Coordinator both from on-site inventories and off-site resources.

All personnel reporting information to an off-site third-party response group will do so after the Emergency Coordinator indicates the need. The person making such notification will give the following information:

(a) Name, telephone number and location of facility,
(b) Time and type of incident (e.g. fire, spill, etc.),
(c) Extent of injuries, if any,
(d) Possible hazards to human health and the environment.

2.6 Identification of Waste Material and Hazard Assessment

As soon as possible, the Emergency Coordinator will determine the character, source, and extent of any released materials by visual inspection and reference to manifests, sample analyses, waste profile sheets, and chemical hazard reference books.

Initial assessment shall include the following parameters, where necessary:

(a) Origin of spill or release,
(b) Condition of the source (e.g. repairable leak, uncontrollable leak, easily moved or unmovable),
(c) Container identification (e.g. label or placard information, type and size of individual containers),

(d) Physical state of spill (e.g. powder, pellets, granular, liquid, or gaseous)
(e) Color of material, and
(f) Noticeable reactions (e.g. fuming, flaming, gas evolution, heat generation).

After the materials have been identified to the fullest extent possible, the Emergency Coordinator shall assess possible hazards, both direct and indirect, to human health or the environment, and subsequently notify the appropriate site personnel and authorities.

The hazard assessment of the Emergency Coordinator will include information gathered from other site personnel. The Emergency Coordinator will receive oral reports from responsible individual(s) as to the condition of all on-site personnel. At least one individual will relay attendance information taken from the sign-in, sign-out list located at the main guardhouse in those situations, which are deemed to be a direct immediate threat to the safety of site personnel. The Emergency Coordinator will also receive information from other personnel concerning the presence and extent of personal injury or casualties. The Emergency Coordinator will assure the appropriate organizations are notified if a personal injury or casualty situation exists (i.e. hospitals, helicopter evacuation service, etc.)

Based on his knowledge of the existing conditions, the Emergency Coordinator will determine the following;

(a) Extent of Injuries, if any,
(b) Possible hazards to the environment and human health inside and outside the facility,
(c) Whether facility personnel can control the situation, if not, immediately notify the appropriate off-site authorities listed in Table 2-2,
(d) Whether to evacuate the facility, if so, then activate the Facility Evacuation Plan found in Section 6.0,
(e) Whether access to the general area of the facility should be restricted though control of the facility access road from Interstate 80.

Delegating of responsibilities may occur in the event of a minor spill of relatively innocuous material during a weekend and possibly at other times such as holidays. In this kind of situation the Emergency Coordinator will be contacted by phone and the EC may elect to direct the response over the telephone. However, a major incident would require the EC to come to the site and direct remedial operations in person. An explosion during normal working hours will require the direct participation of separate personnel filling all the separate functions and positions described herein; whereas, a minor incident during working hours would typically be remediated by the personnel responsible for the area in which the incident occurs after notifying the Emergency Coordinator.

3.0 CONTAINMENT AND CONTROL ACTIVITIES

The operations of the facility shall be designed to minimize potential hazards to facility personnel, contain released materials, and prevent their movement from the facility. Emergency situations and the associated responses follow in the sections below.

3.1 Engineering Features of the Facility Designed to Contain and Control Releases

Surface drainage from the active portion of the facility is collected in a series of berms, dikes,

swales, ditches, and culverts, and routed to run-off control basins or ponds. The retention basins are normally empty because of the infrequence of precipitation and the extent of evaporation. A leaker impound is constructed near the sample platforms for any type of leaking container or truck. Spills at the facility would be initially contained by the use of pumps and stabilization materials. Stabilization materials are typically available from the stabilization area. Pumps are located throughout the facility and can be made available for remediation purposes by contacting operations personnel.

3.2 Personnel Response Activities

The facility is generally prepared to handle incidents, which could cause potential emergencies (e.g. fires, explosions, spills, or materials releases) as discussed in section 1.4.1. The Emergency Coordinator who will supervise the incident according to the following procedures initiates containment and control activities:

3.2.1 Spill or Material Release

(a) Assemble the required response equipment (e.g personnel protective equipment, powered equipment, stabilization reagent, foam chemical suppressants, etc. pumping equipment),
(b) Provide the most appropriate containment or diking method (e.g. earthen dikes, excavation, over pack drums, etc.),
(c) Coordinate the activities of the site personnel while maintaining constant communication with supervisory personnel,
(d) Monitor all facility instrumentation to prevent adverse reactions to other processes.

3.2.2 Fire or Explosion

(a) Assemble required response equipment,
(b) Determine the best method of approach and containment:
- Approach from up-wind direction,
- Utilize foam vapor and fire suppressants using either fire extinguisher and/or trailer mounted unit,
- Utilize dry chemicals if appropriate as in instances with flash-back potential,
- Cool affected containers with flooding quantities of water.

The EC may assign personnel to perform the following positions / functions:

3.2.3 Communications Coordinator

(a) Contact Corporate Office,
(b) Advise off-site response organizations as directed by the Emergency Coordinator.

3.2.4 Casualty Control Officer

(a) Assess extent of injuries or casualties if any,
(b) Assure that prompt emergency medical attention is provided as needed,
(c) Assure that appropriate off-site medical organizations are notified and responding as necessary,
(2) Report status to Emergency Coordinator.

3.2.5 Personnel Coordinator

(a) Coordinate the movement of personnel to designated gathering points in the event of evacuation,
(b) Conduct headcount and identify location of all personnel present,
(c) Establish access control to facility,
(d) Report status to Emergency Coordinator.

3.3 Response Procedures for Containers

Response procedures for fire, explosions, or spills are presented below. The response criteria and the corresponding response procedures address situations, which may occur at the container management area.

3.3.1 Response Criteria

The potential for a fire or explosion occurring in this area is low. However, spills from discrete containers (drums, bags, pails, boxes, etc) are more likely to occur because of the increased handling of these units and the climatologically variances (i.e. freeze/thaw and extreme heat)

If one of the following events occurs, a response action will follow:

Fire or explosion:

(1) A fire or smoldering of waste in or near the waste containers,
(2) Occurrence or potential occurrence of explosion.

Spill or material release

(1) A spill occurring during the unloading, sampling, storage or transfer of containers.

3.3.2 Response Procedures

The standard response procedures outlined in this plan are all that is needed to respond to situations developing in the container management areas. The special provisions outlined below may be necessary in some cases:

Fire or Explosion

(1) Immediate evacuation of the personnel endangered within the area and call for back-up support.
(2) All response personnel will don appropriate protective clothing and SCBA depending upon the source and nature of the fire.
(3) Active working areas have ABC-type fire extinguisher available on process equipment for fighting small fires. In some cases water spray will be used to control vapors and suppress non-chemical fires. Table 4-1 outlines the location of fire extinguisher at the facility.
(3) The cleanup residues will be contained via excavation, sumps, or berm construction.

Spill or Material Release

(1) Spills occurring as a result of off-loading or transport of waste shall be cleaned up immediately and placed in containers, or disposed directly to the landfill using

equipment adequate for the task.

(4) Spills occurring as a result of transport of contaminated wastes within the facility shall be contained by the use of absorbents, sumps, construction of temporary containment booms, or the use of vacuum trucks, as appropriate, the material will be collected and placed in containers for processing or disposal. Soil considered by the ERC as potentially contaminated will be removed, sampled according to the WAP and disposed of as appropriate.

(2) All equipment used during the containment and clean-up operations will be decontaminated or discarded. Rinse waters will flow to a sump for subsequent removal, analysis, treatment and disposal.

3.4 Response Procedures for Landfills

The response procedures for incidents involving the landfills are presented below:

3.4.1 Response Criteria

The potential for a fire or explosion occurring in these disposal areas is very low because of the requirements to treat waste prior to placement in the land disposal units. However, if a situation should develop, a response action will follow:

Fire or Explosion

(1) Spontaneous combustion from materials placed into the landfill cells.

(2) Exothermic conditions resulting from incompatible wasting being co-mingled.

Spill or Material Release

(1) Spills could occur during the loading, unloading or other transfer of waste.

(2) Spills occurring as a result of equipment failure.

3.4.2 Response Procedures

The standard response procedures presented throughout the Contingency Plan, which may be followed if a spill, fire or explosion, occurs in the landfill units of the facility. Specialized consideration which may apply to the landfill units at the facility are presented below:

Fire or Explosion

(1) Immediate evacuation of personnel endangered within the area and call for back up support.

(2) All response personnel will don appropriate protective clothing and SCBA (if necessary), depending on the source and nature of the fire.

(3) The landfill areas have ABC-type fire extinguisher presented in Table 4-1, which are readily available to fight small fires. Water spray from site trucks may also be used.

B. Spill or Material Release

(1) Spills occurring as a result of loading, unloading or other transfer of wastes shall be cleaned up immediately. Spill residues will be collected and treated or disposed as required by the applicable permit conditions and/or regulations.

(2) All equipment used during the containment and clean up operations will be decontaminated or discarded. Rinse waters will be treated and disposed according to the applicable permit conditions and regulations.

3.5 Response Procedures for Tanks

Response procedures for fire, explosion, or spill are presented in this section. The response criteria and the corresponding response procedures address situations, which may occur at any of the bulk liquids storage or treatment areas.

3.5.1 Response Criteria

The potential for a fire or explosion occurring in any of these areas is very low. However, if one of these following incidents occurs, a response action will follow:

Fire or Explosion

(1) A fire from equipment and waste interactions (i.e. sparks).
(2) An explosion from incompatible reagent or waste additions.
(3) A fire from an unexpected exothermic reaction resulting from out-of-specification treatment parameters.

B. Spill or Material Release

(1) Spills could occur during the loading, unloading or other transfer of waste.
(2) Spills occurring as a result of equipment failure.

3.5.2 RESPONSE PROCEDURES

The standard response procedures presented throughout the Contingency Plan will be followed if a spill, fire or explosion occurs in the tank units of the facility. Specialized consideration which may apply to the tank units at the facility are presented below:

A. Fire or Explosion

(1) Immediate evacuation of personnel endangered within the area and call for back up support.
(2) All response personnel will don appropriate protective clothing and SCBA (if necessary), depending on the source and nature of the fire.
(3) The tank areas have ABC-type fire extinguisher presented in Table 4-1, which are readily available to fight small fires. Water spray from site trucks may also be used.

B. Spill or Material Release

(1) Spills occurring as a result of loading, unloading or other transfer of wastes shall be cleaned up immediately. Spill residues will be collected and treated or disposed as required by the applicable permit conditions or regulations.
(2) All equipment used during the containment and clean up operations will be decontaminated or discarded. Rinse waters will be treated and disposed according to the applicable permit conditions and regulations.

3.6 Response Procedures for the Stabilization Area

Response procedures for fire, explosion, or spills are presented below. The response criteria and the related response procedures address situations, which may occur at the stabilization area.

3.6.1 Response Criteria

Fire or Explosion

(1) A fire or explosion may occur during the mixing of waste with reagents.

(2) A fire or explosion may be the result of incompatible wastes being inadvertently mixed together.

Spill or Material Release

(1) Spills could occur during the loading, unloading or other transfer of waste.

3.6.2 RESPONSE PROCEDURES

The standard response procedures presented throughout the Contingency Plan will be followed if a spill, fire or explosion occurs in the stabilization tank units of the facility. Specialized consideration which may apply to the stabilization tank units at the facility are presented below:

Fire or Explosion

(1) Immediate evacuation of personnel endangered within the area and call for back up support.

(2) All response personnel will don appropriate protective clothing and SCBA (if necessary), depending on the source and nature of the fire.

(3) The stabilization tank areas have ABC-type fire extinguisher presented in Table 4-1, which are readily available to fight small fires. Water spray from site trucks may also be used.

Spill or Material Release

(1) Spills occurring as a result of loading, unloading or other transfer of wastes shall be cleaned up immediately. Spill residues will be collected and treated or disposed as required by the applicable permit conditions or regulations.

(2) All equipment used during the containment and clean-up operations will be decontaminated or discarded. Rinse waters will be treated and disposed according to the applicable permit conditions and regulations.

4.0 AVAILABLE EMERGENCY EQUIPMENT

The facility maintains several communications systems, and a variety of on-site equipment suitable for emergency response and accessibility to off-site resources, which are presented in detail in the following sections. The minimum placement of emergency equipment can be found on Figure 4-2 and Table 4-1.

4.1 Communications Systems

The facility is equipped with a number of communications systems, which can be utilized in the event of an emergency. The facility maintains communication both with the outside world and within the facility.

4.2 On-Site Spill Response Equipment

A wide variety of primary emergency response equipment is maintained at the facility in a state of operational readiness. A general diagram presenting this information is presented in figures 4-1 & 4-2. Tables 4-1 through 4-5 list the minimum types and quantities of this equipment that will be available. This equipment includes the following systems:

(1) Water supply for fire response delivered both by a pipeline system and vehicles (site water trucks).
(2) Portable fire extinguisher including A, B, and C class units as listed in Table 4-1,
(3) Both fixed and portable emergency eyewash units found under Table 4-2,
(4) Personnel protective equipment listed under Table 4-3,
(5) Emergency first aid equipment, listed under Table 4-4,
(6) Spill control and countermeasure equipment listed in Table 4-5.

4.3 Outside Contractors

The commercial spill response vendors listed in Table 4-6 will be called in the unlikely event that on-site spill control, countermeasure and containment equipment maintained at the facility is determined by the Emergency Coordinator to be insufficient to address the situation at hand.

4.4 Training

Facility personnel are trained to use the various emergency response systems as detailed under the Facility Training Plan. These training activities may involve a combination of the following programs:

(1) On-site programs given by facility management and training coordinators,
(2) Vendor-provided training for purchased systems,
(3) Contractor-provided training in procedures for emergency response,
(4) Contractor-provided emergency medical training, and
(5) Contractor-provided training in technique of fire fighting and training giving in the operation of the facility firewater response system.

Local response agencies are advised of training modules at the facility when appropriate and invited to send representatives. Information concerning training is presented herein only for information purposes and flow of narrative. All requirements for training are determined by the Training Plan found in this Permit.

4.5 Removal for the Purposes of Training

Any equipment identified in this Contingency Plan may be removed from its identified location for the purposes of training personnel provided it is returned to the identified location as soon as the training is complete. A tag or sign will be left in place of the piece of equipment indicating where it can be located, the name of the person removing the item and approximately when it will be returned. The item will be inspected for readiness status prior to return.

insert **Figure 4-1: EMERGENCY RESPONSE EQUIPMENT (OPERATIONS AREA)**

insert **Figure 4-2: EMERGENCY RESPONSE EQUIPMENT (ADMIN/LAB AREA)**

TABLE 4-1: FIRE EXTINGUISHERS MAINTAINED AT THE FACILITY

1. Dry Chemical ABC

a. Operation Area Locker Room(1)
b. Stabilization (2)
c. North Equipment Maintenance Bldg (2)
d. South Equipment Maintenance Bldg (1)
e. RCRA Wheel Wash (1)
f. Solvent Storage Area (1)
g. Sheds by Active Cells, each (1)
h. Guardhouse (1)
i. Fuel Area (2)
j. Facility Maintenance Bldg (2)
k. Thaw Tent (1)
l. Cell Construction Trailer (1)
m. Drum Dock (5)
n. Operations Area Emergency Generator (1)
o. Employees Lunchroom (smoking) (1)
p. Employees Lunchroom (non-smoking) (1)
q. Hydrogeology Trailer (1)
r. Administration (3)
s. Locker Room (5)
t. Laboratory (4)
u. Generator\UPS (2)
v. Sampler's Storage (1)
w. Sample Platforms (2)
x. Drum Dock Office (Operations Area) (1)

2. Halon or Equivalent Fire Extinguisher

a. Computer Room (Administration) (1)

3. Fixed Dry Chemical System

a. Drum Dock

4. Fixed Halon or Equivalent System

a. Operations Area Records Trailer
b. Records Storage Room (Administration Area)

5. Fixed Wet System

a. Drum Dock
b. Administration
c. Locker Room
d. Laboratory

TABLE 4-2: EMERGENCY EYEWASH AND SHOWER UNITS

LOCATION	NUMBER	DESCRIPTION
Drum Dock Building	3	Eyewash and showers
Stabilization	1	Eyewash and Shower
Each Wheel Washes	1	Eyewash
Laboratory	6	Showers
Laboratory	10	Eyewashes

TABLE 4-3: SPILL RESPONSE PERSONNEL PROTECTIVE EQUIPMENT

	DESCRIPTION	NUMBER
1.	Safety Glasses	(12 pair)
2.	Face Shields	(6)
3.	Goggles	(12 pair)
4.	Chemical Resistant Safety Boots	(12 pair)
5.	Boot Liners	(12 pair)
6.	Fully Encapsulating Suits	(2)
7.	Standard Tyvek Suits	(25)
8.	Saranex w/ Hoods	(25)
9.	Coveralls	(6)
10.	Insulated Coveralls	(6)
11.	Standard Work Gloves	(12 pair)
12.	Neoprene Gloves	(12 pair)
15.	Disposal Vinyl Gloves	(100)
14.	Glove Liners	(12 pair)
15.	SCBA	(4)
16.	Full Face APR	(6)
17.	Organic Vapor/Acid Gas Cartridges	(24)
18.	Ammonia/Methylamine Cartridges	(24)
19.	HEPA Cartridges	(24)
20.	Hard Hat	(12)
21.	Disposable Fully Encapsulating Suits	(6)
22.	Silver Shield Gloves	(10)

*All material maintained in the spill response trailer.

TABLE 4-4: EMERGENCY MEDICAL EQUIPMENT

	DESCRIPTION	NUMBER
1.	Large Weatherproof First-Aid Kit	(1)
2.	Splints	(3)
3.	Emergency Blankets	(3)
4.	Resuscitator Kit	(1)
5.	Emergency Oxygen	(1)
6.	Cold Packs	(24)
7.	Stretcher	(1)

TABLE 4-5: SPILL RESPONSE EQUIPMENT

	DESCRIPTION	NUMBER
1.	Spill Control Booms	(120 feet)
2.	Powdered Absorbent (25# bags)	(10)
3.	Bung Wrench (non-sparking)	(1)
4.	Water Tank (10 gallon or larger)	(1)
5.	Pressurized Spray Tank	(1)
6.	Tool Kit (non-sparking)	(1)
7.	Plastic Tubs	(3)
8.	Plastic for Containing Runoff (sq. ft.)	(1000)
9.	Non-sparking Shovel	(1)
10.	Drum/Leak Repair Kit	(1)
11.	Manual Drum Deheader	(1)
12.	55 Gallon Drums (open head)	(2)
13.	Hand Pump	(1)

*All material is maintained in the spill response trailer.

TABLE 4-6: COMMERCIAL SPILL RESPONSE VENDORS

	CONTRACTOR'S NAME	TYPE OF SERVICE	TELEPHONE NUMBER
1.	TW Company	Spill Response	801-299-1900
2.	Certified Disaster Services	Spill Response	801-298-9666
3.	Onyx Industrial Services	Vacuum Truck	801-225-5600 (day)
4.	Christensen & Griffith	Heavy Equipment	801-531-8155
5.	Wheeler	Heavy Equipment	801-974-0511
6.	H&E (formerly ICM)	Heavy Equipment	801-974-0388

5.0 CASUALTY CONTROL

During the course of any emergency, the prompt delivery of quality emergency medical attention to injured persons is the first priority of the Casualty Control Coordinator as designated by the EC. Secondarily, the Casualty Control Coordinator is responsible for obtaining necessary off-site medical resources, whether they are emergency helicopter evacuation services, ambulance service or other delivery of injured personnel to medical facilities.

A medical doctor prior to resuming work examines all seriously injured personnel. Examination of serious injuries may be provided on an immediate basis through the use of the University of Utah helicopter evacuation service.

The EC or Casualty Control Coordinator performs these functions through the use of the following procedures;

(a) Assessment of the emergency situation to determine both the extent of injuries that have been already manifested and injuries, which may occur because of the current status of the emergency.
(b) Implementation (or advisement of the Emergency Coordinator) of measures necessary to reduce the likelihood for further injury.
(c) Summoning of appropriate off-site resources and coordination of their arrival.
(d) Provision of relief and succor to injured persons by coordination of personnel trained in emergency medical treatment and use of medical equipment identified in Table 4-5.
(e) Assessment of the hazards presented by released materials through use of reference books or telephone advisory services (i.e. 3E @ 800-451-8346 or the National Poison Control Center @ 1-800-456-7707 or 801-581-2151) and advise the Emergency Coordinator accordingly.
(f) Coordination of the admission of any injured personnel to hospital.

6.0 EVACUATION PLAN

The Emergency Coordinator or the senior management official present at the time of the event are the only people authorized to order the evacuation of the facility in response to an emergency which threatens the health and safety of the people at the facility. Evacuation of the facility may be ordered based upon the judgment of the Emergency Coordinator or at the request of local authorities.

The evacuation routes are presented in Figure 1-2.

6.1 Facility Access and Egress

As described in Section 1.1 of this Contingency Plan, the facility is located in a very remote section of the west desert of Utah. The nearest permanently occupied residence is 35 miles away. Because of isolation, the likelihood of impact on uninterested parties is very low. The only personnel likely to be affected by an emergency event are those people who have business at the facility and have traveled the considerable distance necessary to conduct that business.

Access to the facility is controlled at all times. Complete security will be established during the

activation of the Contingency Plan. Only those persons who can contribute to the resolution of the emergency will be admitted to the facility until the crisis has passed.

As is the case under normal times, all persons leaving the facility during an emergency will be signed out (i.e. a record made of that persons departure).

6.2 Procedures for Evacuation

The Emergency Coordinator, or senior management official present, will carry out the evacuation of the facility in the following manner:

(a) Start the emergency siren.
(b) Advise facility personnel of the source of danger and order them to evacuate by announcement over the facility loudspeaker, radio and CB communications system.
(c) The primary evacuation route will be used except when personnel must cross the incident or pass downwind of the incident to reach the gathering point. Alternate evacuation routes will be announced as described in 6.2.b.
(d) Dispatch representatives to the collection points identified on the Evacuation Route Plan (figure 1-2) to conduct a head count and report to the EC or Personnel Coordinator.
(e) Account for all personnel present at the facility by comparison with the sign-in, sign-out sheets.

6.3 Community Impact Considerations

The Emergency Coordinator will take the following actions to assure that local response authorities are capable of properly responding to an emergency situation at the facility:

(a) Submit the approved Contingency Plan to all emergency response authorities and relevant governmental officials.
(b) Review the Contingency Plan with all interested personnel of local emergency authorities.
(c) Extend the training offered to facility personnel to representatives of the local response authorities.
(d) Advise local response authorities of upcoming drills and invite their participation.
(e) Maintain a log of all actions taken to advise, train and coordinate with local agencies.

6.4 Re-Occupancy of the Facility

The Emergency Coordinator in consultation with responding emergency service agencies will make the determination that the facility may be safely re-occupied. Facility activities will resume only after the Emergency Coordinator has given approval.

7.0 POST-EMERGENCY PROCEDURES

Post-emergency procedures are intended to prevent the recurrence of the causative factors, to collect and dispose of residuals, decontaminate equipment, restock utilized materials, and debrief personnel.

7.1 Prevention of Recurrence

The Emergency Coordinator will take all necessary steps to minimize the potential of a secondary release, fire or explosion does not occur after the initial incident. Procedures available to the Emergency Coordinator include:

(a) Monitoring of all pressure gauges, where applicable,
(b) Inspection for any leaks or cracks in pipes, valves, tanks, or containers,

(c) Inspection for gas generation,
(d) Isolation of all collected waste materials.

All operations that were shut down as a result of the incident will not be reactivated until approved by the Emergency Coordinator; actions will be documented by the implementation report.

7.2 Treatment and Disposal of Released Materials and Cleanup Residues

Once the emergency situation has been controlled, the Emergency Coordinator will initiate the collection and disposal of residues. This activity will occur as soon as possible after the event in order to avoid further risk to human health and the environment.

Liquid spills occurring within a containment area (e.g. sumps, loading/unloading area, etc) will be analyzed and treated/disposed accordingly to applicable permit conditions and regulations. Liquid wastes will be either pumped as a fluid or stabilized to allow management as a solid. Leaking containers will be immediately placed into a drum or processed immediately.

The Emergency Coordinator is responsible for coordinating with operations personnel the necessary alterations to normal waste management procedures to address the special requirements of the emergency event, with particular attention paid to segregation of incompatible materials.

7.3 Decontamination and Servicing of Equipment

All equipment used during the response to the emergency event will either be disposed appropriately, or decontaminated and prepared for further use after the crisis has passed. Spray cleaning of the equipment in the wheel wash unit will be the most commonly used method of decontaminating equipment. Rinse water will be recognized as contaminated spill materials and treated as appropriate.

Expended equipment and supplies (i.e. fire extinguisher, etc.) will be recharged and restocked as soon as practicable. Failure to maintain equipment at minimum levels during this restocking and resupply period of time will be considered acceptable provided expended items are reordered within two business days, and if back-up equipment is used in its place.

7.4 Personnel Decontamination, Debriefing and Retraining

All personnel involved in responding to the emergency event will be decontaminated if necessary in the shower room area and change of clothing will be provided. Prior to releasing responding personnel, the Emergency Coordinator shall interview them to determine their interpretation of the relevant events. Based upon this interview the Emergency Coordinator may make recommendations concerning the best methods to prevent or minimize the impact of the emergency situation. Revisions to either the Contingency Plan or operating procedures may be made as a result of this incident.

7.5 Resumption of Operations

Disrupted operations will be returned to normal following the emergency event once the following items have been determined:

(a) All spilled material has been collected or adequately contained,
(b) No incompatible materials have been co-mingled,
(c) All injured personnel are being provided with adequate medical care,
(d) The appropriate regulatory authorities have been notified of the event, the subsequent response activities and the intention to resume normal activities.

8.0 ARRANGEMENTS WITH OFF-SITE RESPONSE & REGULATORY AUTHORITIES

An up-to-date copy of this Contingency Plan is maintained with all local response and regulatory authorities identified in Table 2-3. Revisions to the Contingency Plan will be provided to the organizations identified in Table 2-3. Contact is made with these organizations as necessary to address the emergency situation. The facility periodically offers to share training programs with representatives of these organizations.

A record is maintained at the facility, which documents the dates of plan submissions and modifications to these agencies as well as any important meetings and training sessions.

9.0 REPORTING OF EMERGENCY SPILLS

Section 103 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) requires immediate notification be made to the National Response Center whenever a release of a "reportable quantity" of a hazardous substance into the environment has occurred. It also requires notification of the Tooele County LEPC and the State Emergency Response Commission for releases of a “reportable quantity” that will affect personnel outside of the facility boundaries. (40 CFR 355.40) Quantities to be reported are those material quantities found in the most recent version of 40 CFR 302.

According to R315-9-4, additional written notification must be made to the state of Utah at the following address for spills of 100 Kg for hazardous waste, except for P-listed hazardous waste in which case the trigger amount is 1 Kg, within fifteen days:

Division Director
Division of Solid and Hazardous Waste
Utah Department of Environmental Quality
288 North 1460 West
P.O. Box 144880
Salt Lake City, Utah 84114

Telephone 801 538-6170

The information required for reporting purposes is found on the form in Figure 9-1. Documentation of the completed reports is maintained on-site as part of the operating record.

FIGURE 9-1: EMERGENCY SPILL RESPONSE REPORT FORM

1. Name_____ Phone #_____
   Address_____

2. Date__/__/__ Time
   Location_____
   Nature of Incident_____

3. Name of Material_____
   Quantity Spilled_____

4. Extent of Injuries, if any _____

5. Assessment of Actual or Potential Hazards to Human
   Health or the Environment_____

6. Estimated Quantity and Disposition of Recovered
   Material that Resulted from the Spill _____

Signature of Incident Reporter _____ Date _____

10.0 AMENDMENTS TO CONTINGENCY PLAN

This Contingency Plan shall be reviewed and immediately amended under the following circumstances:

(a) The Contingency Plan fails to meet reasonable expectations under an actual emergency,
(b) The applicable permits or approval letters to the facility are revised or amended,
(c) The facility alters the design or operation of the processes which significantly alter the potential for fires, explosions, or release of hazardous waste or materials,
(d) The regulations applicable to the facility change,
(e) The regulations applicable to the facility change, after showing reasonable cause,
(f) The inventory of emergency response equipment changes,
(g) Key personnel change (e.g. Emergency Coordinator).

11.0 NOTIFICATION OF UNAUTHORIZED TRANSFER OF TSCA-REGULATED MATERIALS

Should any event occur resulting in the unauthorized transfer of TSCA regulated materials below the threshold of a spill or material release (i.e. less than a reportable quantity), certain Contingency Plan actions will be initiated.

First, within twenty-four (24) hours of the knowledge that any material has been improperly removed from the TSCA facility, the Facility Manager or his designee shall verbally notify the U.S. EPA Region VIII. This notification will provide basic information regarding the nature of the material, the location of the material, plans to recover the material and other relevant facts.

Second, within 5 (five) business days of the knowledge that any material has been improperly removed from the TSCA facility, the Facility Manager or his designee shall submit a written notification letter to the U.S. EPA Region VIII. This notification will provide basic information documenting the verbal notification and the nature of the material, the location of the material, plans to recover the material and other relevant facts. The written notification will provide any additional facts gathered following the verbal notification. The written notification will include the facility's planned actions in response to the incident, including without limitation, actions taken to identify the source of the material (i.e. the generator(s) and specific equipment or material(s) involved, plans to recover the material, sampling intended for the material and locations it may have been placed or handled and plans for decontamination of locations that are determined "contaminated" based on the results of sampling. Contaminated would be determined by wipe sampling results indicative that an impermeable surface has PCB levels in excess of 10 micrograms per 100 square centimeters.

Last, at the conclusion of the actions taken under the written notification and action plan, the facility shall submit a summary report to U.S. EPA Region VIII. The summary report will include the results of all sampling, description of any decontamination efforts (if required) and the results of confirmation sampling performed to demonstrate successful remedial action.